

HPOZ Summary Points

1. The Pico Union HPOZ is intended to be a residential district, but 1330 Pico is a commercial/industrial building.
2. The Pico Union HPOZ specifically excludes all buildings along Olympic, Pico, Washington, and Venice but not this property. The subject building is split by the HPOZ (unlike the Pico/Burlington building for example).
3. The existing building was built 1966, outside the period of significance of HPOZ (1860-1940) and is not of the architectural style intended to be preserved in the HPOZ.
4. The existing building is a non-contributing building as identified in the HPOZ survey and not eligible for listing as an historic resource.

1987



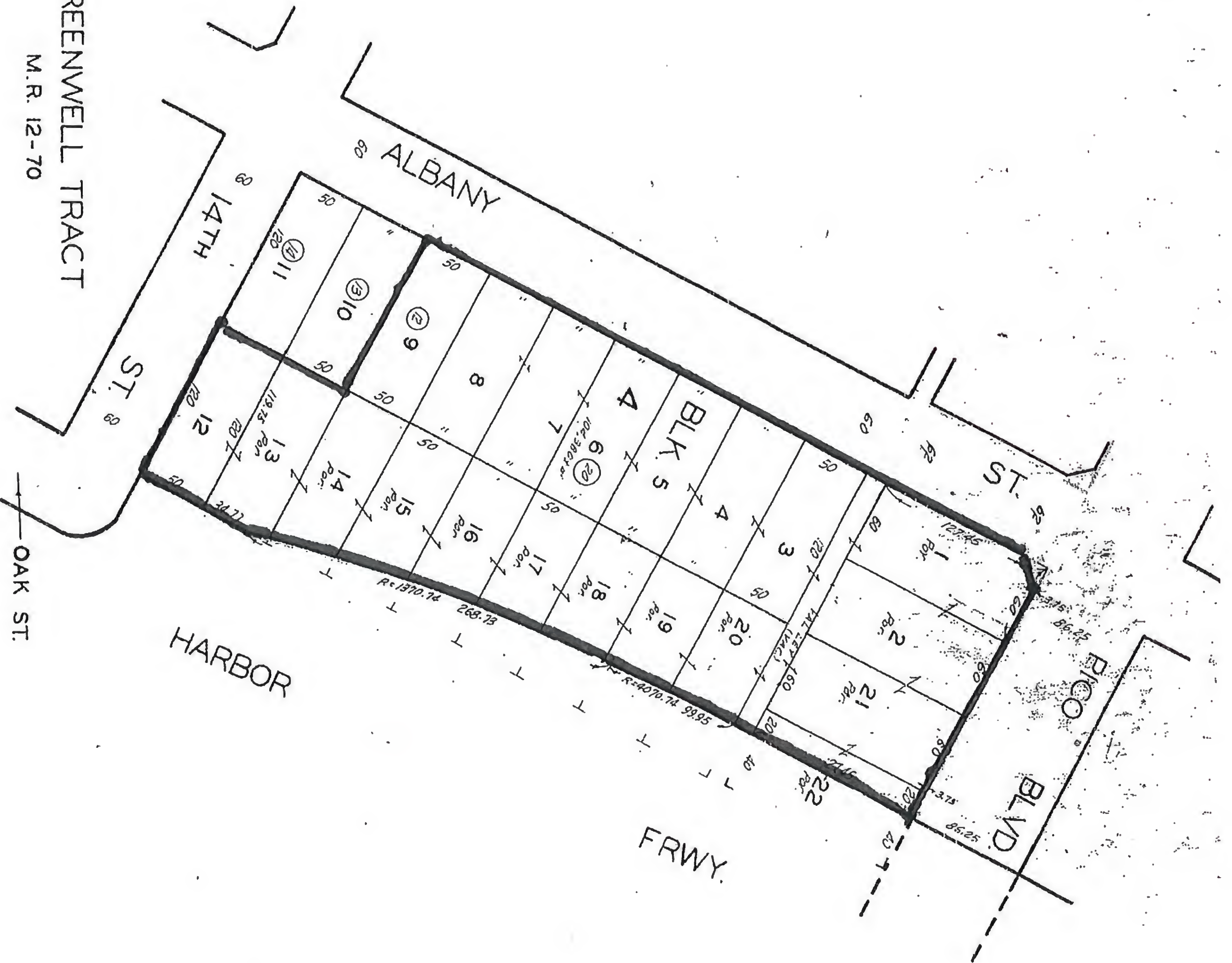
CODE
30

FOR PREV. ASSMT. SEE: 31-9

GREENWELL TRACT

M. R. 12-70

OAK ST.



Pico - Union Historic Preservation Overlay Zone

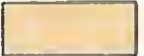



Includes Historic Context Statement

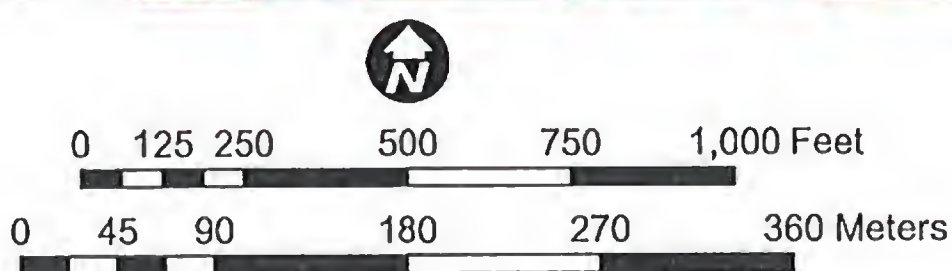
Ordinance 176,156
Adoption Date: 08-03-2004
Effective Date: 09-25-2004

CPC-2002-6297-HPOZ
Council File Index 00-1566-S2



Structure Designation

-  Contributing Feature
-  Non-Contributing Feature
-  Not Available
-  HPOZ Boundary



City of Los Angeles - Department of City Planning - S. Gail Goldberg, Director



August 10, 2017

Sandstone Properties, Inc.
10877 Wilshire Boulevard, Suite 1105
Los Angeles, CA 90024

RE: 1330 West Pico Boulevard, Los Angeles, CA

As a follow-up to our phone call yesterday, you have asked me to further explain why the boundary of the Pico-Union Historic Preservation Overlay Zone (HPOZ) appears to be in error as it pertains to 1330 West Pico Boulevard (Assessor Parcel Number 5135-035-020, hereinafter referred to as "subject property"). The subject property also has the address 1308 South Albany Street. The subject property is developed with one industrial building constructed from 1966-1968 for Jeffries Banknote Company, with additions constructed in 1980.

Background

The subject property is located immediately west of downtown Los Angeles and the Los Angeles Convention Center. Oriented north, the subject property is bounded to the north by Pico Boulevard, to the east by a parking lot and the 110-Freeway, to the south by 14th Street, and to the west by Albany Street. The one building at the subject property is set back from the north property line by a surface parking lot and front yard. Although designed with elements of Mid-Century Modern and Late Modern architectural styles, the building reads as a utilitarian, rectangular, two-story building with exterior walls of split-face concrete block resembling brick, with fenestration and decorative features concentrated at the north façade.

The Pico Union HPOZ consists of three subareas generally bounded by 11th Street and Olympic Boulevard to the north, Union Avenue and the 110-Freeway to the east, Washington Boulevard and the 10-Freeway to the south, and Hoover Street to the west. The Pico-Union HPOZ consists of 798 structures, 528 of which are "contributing" to the significance of the area. The area was found to be significant for its concentration of residential properties "dating from the late 19th century through the early 1930s."¹ The Pico-Union Preservation Plan describes the HPOZ as "developed as a predominantly residential enclave that provided an appealing combination of comfortable access to and distance from transportation and commercial areas."²

Quite confusingly, the map of the Pico Union HPOZ shows the boundary cutting through the one building at the subject property so that one third of the property along Pico Boulevard is outside the boundary, while approximately two-thirds of the property is included within the boundary. The portion of the building within the boundary of the HPOZ has been identified as a non-contributing feature. This is a highly unusual situation, as buildings are either included or not within the

¹ Los Angeles City Planning Commission, City Plan Case No. 2002-6297-HPOZ, June 17, 2004, pages 3-4.

² City of Los Angeles Planning Department, "Pico-Union Preservation Plan," October 12, 2006, page 11.

boundaries of a HPOZ. Given the following reasons, this situation appears to be a technical error and the HPOZ survey and boundaries should be amended to exclude the subject property from the boundaries of the Pico-Union HPOZ.

- The HPOZ Survey gave the subject property an evaluation code of “6.” Completed in April 2002 and approved by the Cultural Heritage Commission on December 17, 2003, the survey gave the subject property an evaluation code of “6” (see Attachment A). These evaluation codes appear to be based on California Historical Resource Status Codes (see Attachment B). An evaluation code of “6” indicates that the subject property is “not eligible for listing or designation.”

The Office of Historic Preservation created status codes in 1975 as a tool to classify historical resources. Status codes were created to “serve as a starting place for further consideration and evaluations.”³ Broad categories of California Historical Resource Status Codes are defined as:

1. Properties listed in the National Register (NR) or the California Register (CR)
2. Properties determined eligible for listing in the National Register (NR) or the California Register (CR)
3. Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation
4. Appears eligible for National Register (NR) or California Register (CR) through other evaluation
5. Properties Recognized as Historically Significant by Local Government
6. Not Eligible for Listing or Designation as specified
7. Not Evaluated for National Register (NR) or California Register (CR) or Needs Reevaluation [sic]

These categories are divided into more descriptive and specific subcategories. In 2003, the State Historic Preservation Officer revised the status codes. Although the divisions of the status codes of previously evaluated properties were reclassified, the initial status code of 1-5, the one assigned to a property prior to revision in 2003, remained constant.

The survey form for the subject property, which identifies it both with its Pico address as well as its Albany address, further elaborates that the “structure does not retain its association with the historical development of the area as a result of a loss of material integrity or was built after the period of significance.” Dating from the late 1960s, the subject property is over 30 years older than contributing properties to the HPOZ. The survey finding of “6,” or “not eligible for listing or designation” appears appropriate for the totality of the property, as identified in the survey form.

³ California State Office of Historic Preservation, *Technical Assistance Bulletin #8; User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory*, November 2004, 5. This publication is available on the website: <http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.

- **The Pico-Union HPOZ specifically excludes commercial properties**

As noted in the Pico-Union Preservation Plan, "The areas that did not meet the criteria for HPOZ designation, principally the commercial corridors along Olympic, Pico, Venice, and Washington Boulevard, were excluded from the HPOZ boundaries."⁴ The Preservation Plan later identifies "Historical Themes and Associative Property Types." Notably, the only theme identified is "Residential Development" with property types "Single Family Homes," "Multi Family Residential Structures," and "Landscape Features."⁵ The Preservation Plan does not include any discussion of contributing commercial property types. In addition, the Survey Map carefully draws the HPOZ boundary to exclude all other commercial properties. For example, the entirety of 1800 West Pico Boulevard was excluded from the HPOZ, even though the building was constructed circa 1922, within the period of significance of the HPOZ.

The subject property is a commercial property that historically also functioned for manufacturing. Like all other commercial properties along Pico Boulevard, the subject property should have been excluded from the boundaries of the HPOZ.

- **A building in an HPOZ may not be split to be partly within and partly outside the boundary.**

As noted above, the one building on the subject property is split so that it is partly within and partly outside the boundary of the Pico-Union HPOZ. The HPOZ ordinance defines a non-contributing element as "any building, structure, Natural Feature, lot, or Landscaping, that is identified in the Historic Resources Survey as a Non-Contributing Element, or not listed in the Historic Resources Survey."⁶ It is important to note that the definition does *not* state "any *portion* of a building" implying a building, structure, Natural Feature, etc. is either a non-contributing element or it is not. The definition does not allow for only a portion of a building to be non-contributing. As the Pico-Union boundary currently exists, it creates a situation in which the one building at the subject property does not fully comply with the definition of a Non-Contributing Element.

Conclusion

Clearly, the subject property should be entirely excluded from the boundary of the Pico-Union HPOZ. Not only was it identified in the Historic Resources Survey as "not eligible for designation," it is a commercial property, all of which were specifically excluded from the Pico-Union HPOZ. Finally, it is not possible within the definition of a non-contributing element of a HPOZ, per the HPOZ ordinance, for the one building on the subject property to be partly within and partly outside the boundaries of the HPOZ. Therefore, as provided for in the HPOZ Ordinance (see §12.20.3(F)3(d)), I recommend that the technical error in the certified Historic Resources Survey be modified to exclude the full extent of the one building at the subject property from the boundaries of the Pico-Union HPOZ.

⁴ City of Los Angeles Planning Department, "Pico-Union Preservation Plan," October 12, 2006, page 8.

⁵ City of Los Angeles Planning Department, "Pico-Union Preservation Plan," October 12, 2006, pages 11-16.

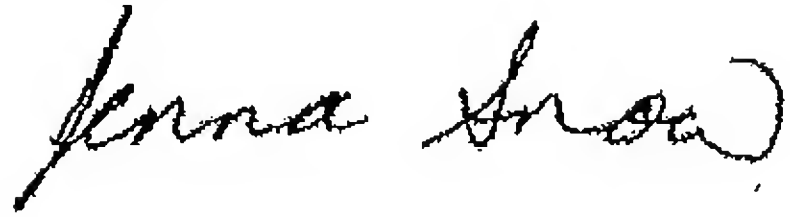
⁶ Los Angeles Municipal Code, §12.20.3 (B) 17.

August 10, 2017

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Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jenna Snow". The signature is written in black ink and is positioned below the word "Sincerely,".

Pico-Union Historic Preservation Overlay Zone Survey

Evaluation Code = 6

Location: 1330 W Pico BLVD/1308 S Albany ST, Los Angeles, CA

Property Name:

Description: The property contains a two-story warehouse with a rectangular plan and concrete construction. Designed with a commercial form, it has a flat roof and a slight parapet. The exterior walls are clad with concrete block. The fenestration consists of metal fixed and single pane windows.

Alterations:

Date Built: 1967

Architect: Unknown

Builder: Unknown

Original Owner: Unknown

Evaluation: Additional Resource Surveyed

HPOZ Criterion: 6 - Structure does not retain its association with the historical development of the area as a result of a loss of material integrity or was built after the period of significance.

Other Evaluations:

Survey Date: April 2002

Photograph Filename: Pico Boulevard\1300-1399\Pico1300.jpg



1330 Pico BLVD

California Historical Resource Status Codes

1. Properties listed in the National Register (NR) or the California Register (CR)

- 1D Contributor to a district or multiple resource property listed in NR by the Keeper. Listed in the CR.
- 1S Individual property listed in NR by the Keeper. Listed in the CR.
- 1CD Listed in the CR as a contributor to a district or multiple resource property by the SHRC
- 1CS Listed in the CR as individual property by the SHRC.
- 1CL Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after December 1997 and recommended for listing by the SHRC.

2. Properties determined eligible for listing in the National Register (NR) or the California Register (CR)

- 2B Determined eligible for NR as an individual property and as a contributor to an eligible district in a federal regulatory process. Listed in the CR.
- 2D Contributor to a district determined eligible for NR by the Keeper. Listed in the CR.
- 2D2 Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in the CR.
- 2D3 Contributor to a district determined eligible for NR by Part I Tax Certification. Listed in the CR.
- 2D4 Contributor to a district determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
- 2S Individual property determined eligible for NR by the Keeper. Listed in the CR.
- 2S2 Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.
- 2S3 Individual property determined eligible for NR by Part I Tax Certification. Listed in the CR.
- 2S4 Individual property determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
- 2CB Determined eligible for CR as an individual property and as a contributor to an eligible district by the SHRC.
- 2CD Contributor to a district determined eligible for listing in the CR by the SHRC.
- 2CS Individual property determined eligible for listing in the CR by the SHRC.

3. Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation

- 3B Appears eligible for NR both individually and as a contributor to a NR eligible district through survey evaluation.
- 3D Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
- 3S Appears eligible for NR as an individual property through survey evaluation.
- 3CB Appears eligible for CR both individually and as a contributor to a CR eligible district through a survey evaluation.
- 3CD Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation.
- 3CS Appears eligible for CR as an individual property through survey evaluation.

4. Appears eligible for National Register (NR) or California Register (CR) through other evaluation

- 4CM Master List - State Owned Properties – PRC §5024.

5. Properties Recognized as Historically Significant by Local Government

- 5D1 Contributor to a district that is listed or designated locally.
- 5D2 Contributor to a district that is eligible for local listing or designation.
- 5D3 Appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation.
- 5S1 Individual property that is listed or designated locally.
- 5S2 Individual property that is eligible for local listing or designation.
- 5S3 Appears to be individually eligible for local listing or designation through survey evaluation.
- 5B Locally significant both individually (listed, eligible, or appears eligible) and as a contributor to a district that is locally listed, designated, determined eligible or appears eligible through survey evaluation.

6. Not Eligible for Listing or Designation as specified

- 6C Determined ineligible for or removed from California Register by SHRC.
- 6J Landmarks or Points of Interest found ineligible for designation by SHRC.
- 6L Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.
- 6T Determined ineligible for NR through Part I Tax Certification process.
- 6U Determined ineligible for NR pursuant to Section 106 without review by SHPO.
- 6W Removed from NR by the Keeper.
- 6X Determined ineligible for the NR by SHRC or Keeper.
- 6Y Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.
- 6Z Found ineligible for NR, CR or Local designation through survey evaluation.

7. Not Evaluated for National Register (NR) or California Register (CR) or Needs Reevaluation

- 7J Received by OHP for evaluation or action but not yet evaluated.
- 7K Resubmitted to OHP for action but not reevaluated.
- 7L State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 – Needs to be reevaluated using current standards.
- 7M Submitted to OHP but not evaluated - referred to NPS.
- 7N Needs to be reevaluated (Formerly NR Status Code 4)
- 7N1 Needs to be reevaluated (Formerly NR SC4) – may become eligible for NR w/restoration or when meets other specific conditions.
- 7R Identified in Reconnaissance Level Survey: Not evaluated.
- 7W Submitted to OHP for action – withdrawn.

After our conversation, I did a little digging and spoke with one of the firm's principals.

I'm attaching scans of four documents that should be public record and were part of what HRG shared with the City of LA Planning Dept when the survey work was done. These show our recommendations, and as you may have noted, this was intended to be a residential survey so your client's large building, and buildings along Pico generally, would have been excluded. From these docs, it appears that the city drew the boundary along the alley, not realizing they were not following the boundaries of actual buildings. I suspect it's much harder to amend the boundaries, but this appears to be what took place. Logically, the boundary should have excluded their building and looped in the other two contributors on that block.

If it appears that we can be of further help, please let me know.

Best,

Holly Kane
*Development Manager/
Associate Historian*

HISTORIC RESOURCES GROUP
12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-3816
Telephone 626 793 2400 x115, Facsimile 626 793 2401
holly@historicresourcesgroup.com

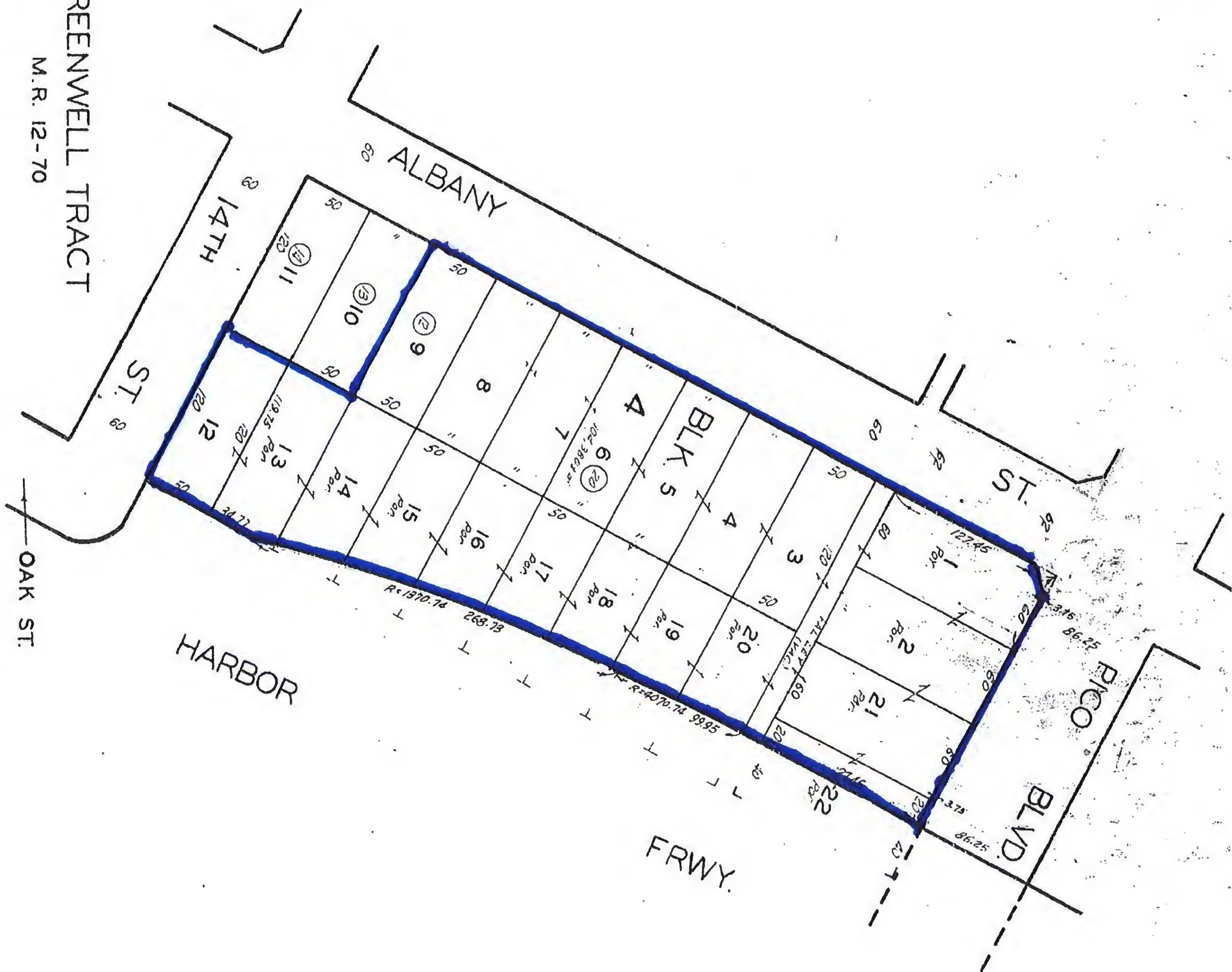
1987

CODE
30

FOR PREV. ASSMT. SEE: 31-9

GREENWELL TRACT
M. R. 12-70

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.



Pico - Union Historic Preservation Overlay Zone





Includes Historic Context Statement

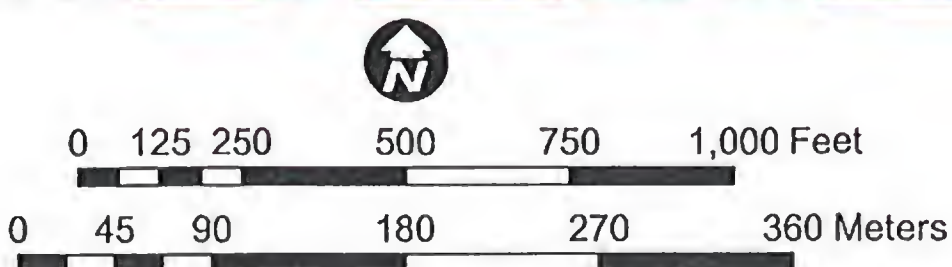
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The subject property is a commercial property that historically also functioned for manufacturing. Like all other commercial properties along Pico Boulevard, the subject property should have been excluded from the boundaries of the HPOZ.

- **A building in an HPOZ may not be split to be partly within and partly outside the boundary.**
As noted above, the one building on the subject property is split so that it is partly within and partly outside the boundary of the Pico-Union HPOZ. The HPOZ ordinance defines a non-contributing element as “any building, structure, Natural Feature, lot, or Landscaping, that is identified in the Historic Resources Survey as a Non-Contributing Element, or not listed in the Historic Resources Survey.”⁶ It is important to note that the definition does *not* state “any *portion* of a building” implying a building, structure, Natural Feature, etc. is either a non-contributing element or it is not. The definition does not allow for only a portion of a building to be non-contributing. As the Pico-Union boundary currently exists, it creates a situation in which the one building at the subject property does not fully comply with the definition of a Non-Contributing Element.

Conclusion

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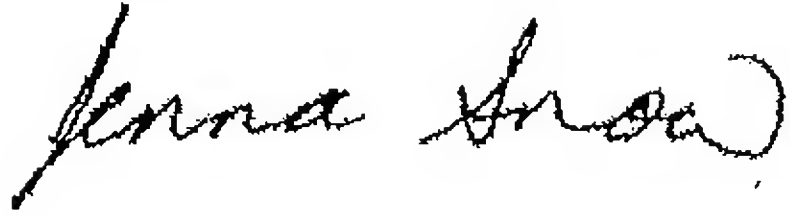
⁶ Los Angeles Municipal Code, §12.20.3 (B) 17.

August 10, 2017

Page 4

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jenna Snow". The signature is written in dark ink and is positioned below the word "Sincerely,".

Pico-Union Historic Preservation Overlay Zone Survey

Evaluation Code = 6

Location: 1330 W Pico BLVD/1308 S Albany ST, Los Angeles, CA

Property Name:

Description: The property contains a two-story warehouse with a rectangular plan and concrete construction. Designed with a commercial form, it has a flat roof and a slight parapet. The exterior walls are clad with concrete block. The fenestration consists of metal fixed and single pane windows.

Alterations:

Date Built: 1967

Architect: Unknown

Builder: Unknown

Original Owner: Unknown

Evaluation: Additional Resource Surveyed

HPOZ Criterion: 6 - Structure does not retain its association with the historical development of the area as a result of a loss of material integrity or was built after the period of significance.

Other Evaluations:

Survey Date: April 2002

Photograph Filename: Pico Boulevard\1300-1399\Pico1300.jpg



1330 Pico BLVD

California Historical Resource Status Codes

1. Properties listed in the National Register (NR) or the California Register (CR)

- 1D Contributor to a district or multiple resource property listed in NR by the Keeper. Listed in the CR.
- 1S Individual property listed in NR by the Keeper. Listed in the CR.
- 1CD Listed in the CR as a contributor to a district or multiple resource property by the SHRC
- 1CS Listed in the CR as individual property by the SHRC.
- 1CL Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after December 1997 and recommended for listing by the SHRC.

2. Properties determined eligible for listing in the National Register (NR) or the California Register (CR)

- 2B Determined eligible for NR as an individual property and as a contributor to an eligible district in a federal regulatory process. Listed in the CR.
- 2D Contributor to a district determined eligible for NR by the Keeper. Listed in the CR.
- 2D2 Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in the CR.
- 2D3 Contributor to a district determined eligible for NR by Part I Tax Certification. Listed in the CR.
- 2D4 Contributor to a district determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
- 2S Individual property determined eligible for NR by the Keeper. Listed in the CR.
- 2S2 Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.
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- 2S4 Individual property determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
- 2CB Determined eligible for CR as an individual property and as a contributor to an eligible district by the SHRC.
- 2CD Contributor to a district determined eligible for listing in the CR by the SHRC.
- 2CS Individual property determined eligible for listing in the CR by the SHRC.

3. Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation

- 3B Appears eligible for NR both individually and as a contributor to a NR eligible district through survey evaluation.
- 3D Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
- 3S Appears eligible for NR as an individual property through survey evaluation.
- 3CB Appears eligible for CR both individually and as a contributor to a CR eligible district through a survey evaluation.
- 3CD Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation.
- 3CS Appears eligible for CR as an individual property through survey evaluation.

4. Appears eligible for National Register (NR) or California Register (CR) through other evaluation

- 4CM Master List - State Owned Properties – PRC §5024.

5. Properties Recognized as Historically Significant by Local Government

- 5D1 Contributor to a district that is listed or designated locally.
- 5D2 Contributor to a district that is eligible for local listing or designation.
- 5D3 Appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation.
- 5S1 Individual property that is listed or designated locally.
- 5S2 Individual property that is eligible for local listing or designation.
- 5S3 Appears to be individually eligible for local listing or designation through survey evaluation.
- 5B Locally significant both individually (listed, eligible, or appears eligible) and as a contributor to a district that is locally listed, designated, determined eligible or appears eligible through survey evaluation.

6. Not Eligible for Listing or Designation as specified

- 6C Determined ineligible for or removed from California Register by SHRC.
- 6J Landmarks or Points of Interest found ineligible for designation by SHRC.
- 6L Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.
- 6T Determined ineligible for NR through Part I Tax Certification process.
- 6U Determined ineligible for NR pursuant to Section 106 without review by SHPO.
- 6W Removed from NR by the Keeper.
- 6X Determined ineligible for the NR by SHRC or Keeper.
- 6Y Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.
- 6Z Found ineligible for NR, CR or Local designation through survey evaluation.

7. Not Evaluated for National Register (NR) or California Register (CR) or Needs Reevaluation

- 7J Received by OHP for evaluation or action but not yet evaluated.
- 7K Resubmitted to OHP for action but not reevaluated.
- 7L State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 – Needs to be reevaluated using current standards.
- 7M Submitted to OHP but not evaluated - referred to NPS.
- 7N Needs to be reevaluated (Formerly NR Status Code 4)
- 7N1 Needs to be reevaluated (Formerly NR SC4) – may become eligible for NR w/restoration or when meets other specific conditions.
- 7R Identified in Reconnaissance Level Survey: Not evaluated.
- 7W Submitted to OHP for action – withdrawn.

After our conversation, I did a little digging and spoke with one of the firm's principals.

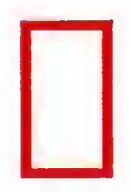
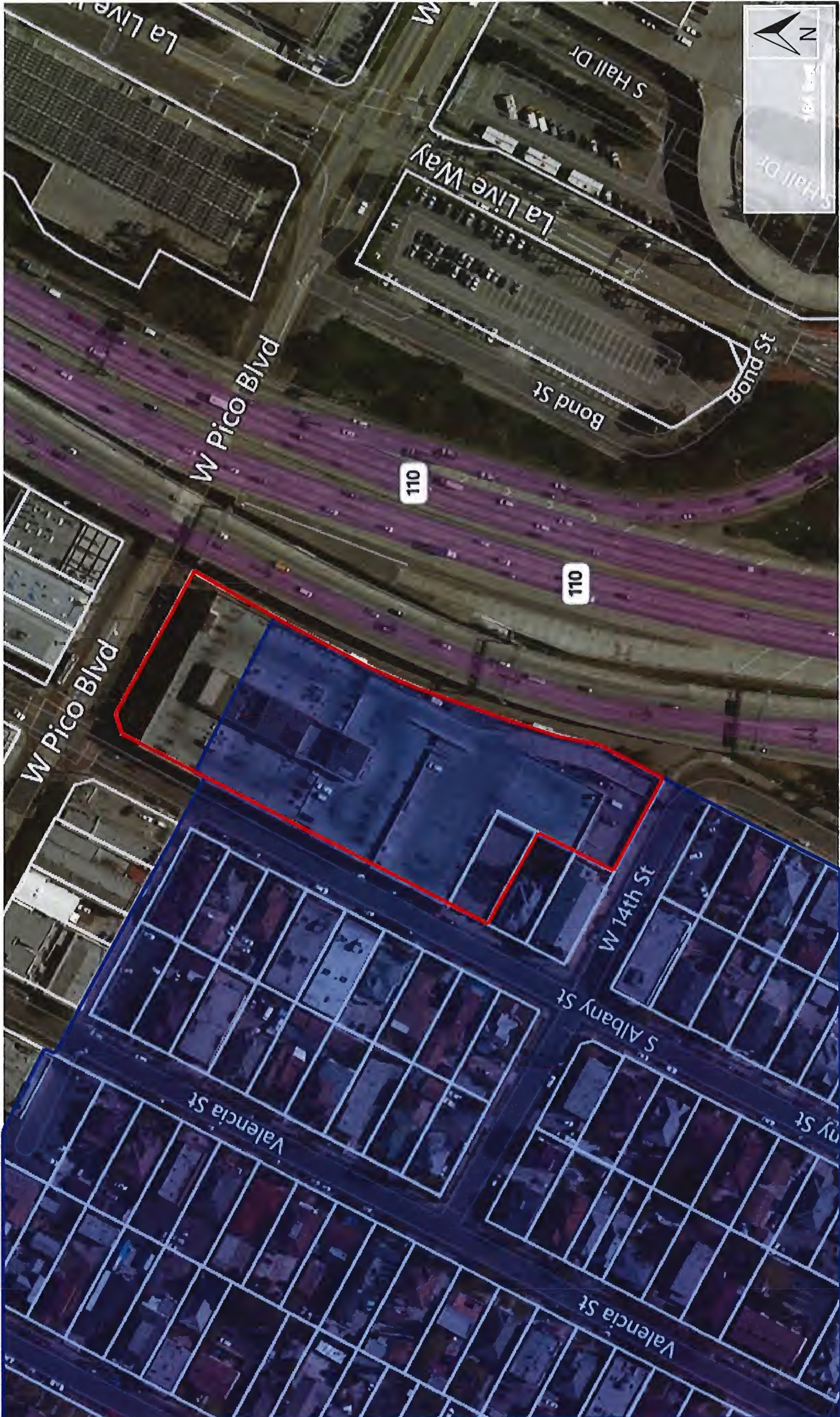
I'm attaching scans of four documents that should be public record and were part of what HRG shared with the City of LA Planning Dept when the survey work was done. These show our recommendations, and as you may have noted, this was intended to be a residential survey so your client's large building, and buildings along Pico generally, would have been excluded. From these docs, it appears that the city drew the boundary along the alley, not realizing they were not following the boundaries of actual buildings. I suspect it's much harder to amend the boundaries, but this appears to be what took place. Logically, the boundary should have excluded their building and looped in the other two contributors on that block.

If it appears that we can be of further help, please let me know.

Best,

Holly Kane
*Development Manager/
Associate Historian*

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